

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
No. 1:19-cv-01219-UNA



ALICIA A. COHEN,
Plaintiff,

v.

RONALD A. COHEN,
Defendant.

DEFENDANT'S ANSWER

NOW COMES Defendant, Ronald A. Cohen, and responds to the Complaint. All allegations not herein specifically admitted are denied. Otherwise, Defendant responds to the allegations of the Complaint as follows:

INTRODUCTION

1. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant specifically denies the actions as described in this paragraph.

THE PARTIES, JURISDICTION, AND VENUE

2. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

3. It is admitted that Defendant is a resident of Leland, North Carolina. It is also admitted the Defendant previously resided in Delaware. It is also admitted that the Defendant has gone by the names Rafi and Ron. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

4. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

5. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

6. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

7. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

BACKGROUND ON THE DISPUTE

Early Sexual Abuse and Commercial Sexual Exploitation

8. It is admitted that the Defendant and his family lived in Newark, Delaware. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

9. It is admitted that in or about 1985, the Defendant and his family lived in Oklahoma. It is also admitted that at some point in time, the Defendant and the Defendant's ex-wife Louise took a one-week trip to Canada and the Plaintiff and her brother remained in Oklahoma with friends. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

10. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies "facilitating" the actions as described in this paragraph.

11. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

12. Denied. Defendant specifically denies the allegations related to a "paddle" described in this paragraph.

13. Denied.

14. Defendant is without sufficient knowledge to admit or deny the allegations contained herein and therefore, the allegations are denied.

Child Sexual Abuse and Trafficking in Delaware at the Family Home, at "Prayer Meetings," and at "Board Meetings; the Making and Sale of Tapes

15. It is admitted that in or about September, 1985, the Defendant and his family returned to Delaware, residing at 44 Vansant Road, Newark, Delaware. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

16. Denied.

17. Denied.

18. It is admitted that the Defendant hosted prayer meetings in the family home. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

19. Denied.

20. Denied

21. Denied.

22. It is admitted that Dr. E was the Defendant's family dentist in Delaware at some point in time. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

23. Denied.

Further Trafficking Across State Lines

24. Denied.

25. It is admitted that Defendant and his family did take a trip to Disney World in Orlando, Florida. It also admitted that while in Orlando, the Defendant and his family visited with Defendant's cousin Lawrence. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

26. Denied.

27. Denied.

28. It is admitted that Michael and Cindy S. lived in New Jersey and the Defendant and his family visited the home of Michael and Cindy S. It is admitted that Michael and Cindy S. have two children approximately Plaintiff's age. It is also admitted that the Defendant and his family were close family friends with Michael and Cindy S. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

29. Denied.

30. Denied.

31. Denied.

Additional Threats to Plaintiff and Efforts to Hide the Abuse

32. Denied.

33. Denied.

34. Denied.

35. It is admitted that at some point in time, Plaintiff's mother Louise took Plaintiff to a therapist. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

36. It is admitted that Plaintiff and her brother were home schooled by their mother Louise. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

37. Denied.

38. Denied.

39. Denied.

Laundering the Money and Using Ministry as Cover

40. It is admitted that the Defendant has been an ordained minister since August, 1985. It is admitted that the Defendant is often referred to as "Reverend." It is also admitted that the Defendant has created, operated or been affiliated with numerous ministries (including some websites) including Miracle Tabernacle Ministries, Messianic Tabernacle Ministries International, Travelling Ministers Fellowship, TMF Ministries, The Aaliyah Project and Wilmington Aaliyah. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

41. Denied.

42. It is admitted that Defendant and his family worshipped at the House of Praise. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

43. It is admitted that Defendant's ministries are supported through donations. It is expressly denied that those donations were for sex acts. Except as admitted herein, the remaining allegations contained in this paragraph are denied.

End of Direct Sexual Abuse, but Trafficking and Trauma Continue

44. Denied.

45. It is admitted that Plaintiff saw a psychiatrist or therapist at some point in time. Defendant is without sufficient knowledge to admit or deny the remaining allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

46. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

47. Denied.

48. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

Repression and Recovery of Memories

49. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

50. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

51. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

52. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

53. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

54. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

Summary

55. Denied.

56. Denied. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma.

COUNT I

HUMAN TRAFFICKING UNDER FEDERAL LAW – 18 U.S.C. § 2255

**(Predicate Violations of 18 U.S.C. §§ 1589-91,
2241(c), 2242-43, 2251-52A 2260, 2421-23)**

57. The responses in the preceding paragraphs are incorporated by reference.

58. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

59. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

60. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

61. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

62. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

63. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied.

COUNT II

SEXUAL ABUSE OF A MINOR BY AN ADULT - DELAWARE

(Rape, Incest, Human Trafficking, Sexual Abuse of a Child By A Person in a Position of Trust, Sexual Extortion, Continuous Abuse of a Child, Dangerous Crime Against A Child Under 14, Offensive Touching, Indecent Exposure)

64. The responses in the preceding paragraphs are incorporated by reference.
65. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
66. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
67. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
68. Denied.
69. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
70. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT III

ASSAULT AND BATTERY - DELAWARE

71. The responses in the preceding paragraphs are incorporated by reference.
72. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore,

the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

73. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

74. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

75. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

76. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

77. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT IV

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS - DELAWARE

78. The responses in the preceding paragraphs are incorporated by reference.
79. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
80. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.
81. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.
82. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
83. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT V

NEGLIGENT INFILCTION OF EMOTIONAL DISTRESS - DELAWARE

84. The responses in the preceding paragraphs are incorporated by reference.

85. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

86. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

87. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

88. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

89. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

90. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT VI

FALSE IMPRISONMENT - DELAWARE

91. The responses in the preceding paragraphs are incorporated by reference.
92. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.
93. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.
94. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.
95. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

96. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

97. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

98. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

99. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT VII

HUMAN TRAFFICKING - DELAWARE

100. The responses in the preceding paragraphs are incorporated by reference.

101. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

102. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

103. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

104. Denied.

105. Denied.

106. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

107. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

108. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

109. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT VIII

SEXUAL BATTERY OF A MINOR - FLORIDA

110. The responses in the preceding paragraphs are incorporated by reference.

111. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

112. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied

113. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme

mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

114. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

115. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting Plaintiff.

116. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

117. Denied.

118. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT IX

HUMAN TRAFFICKING - FLORIDA

119. The responses in the preceding paragraphs are incorporated by reference.

120. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

121. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

122. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

123. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

124. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

125. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

126. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

127. Denied.

128. Denied.

129. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

130. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT X

INCEST - FLORIDA

131. The responses in the preceding paragraphs are incorporated by reference.

132. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

133. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

134. Denied.

135. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

136. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT XI

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS - FLORIDA

137. The responses in the preceding paragraphs are incorporated by reference.

138. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

139. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

140. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

141. Denied.

142. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

143. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

COUNT XII

FALSE IMPRISONMENT - FLORIDA

144. The responses in the preceding paragraphs are incorporated by reference.

145. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

146. Denied.

147. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

148. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

149. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

150. The allegations contained in this paragraph including legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied. Defendant is without sufficient knowledge to admit or deny the allegations contained herein, and therefore, the allegations are denied. Defendant specifically denies he has caused Plaintiff's extreme mental, physical, psychological, and emotional trauma. Defendant denies assaulting or restraining Plaintiff.

151. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

152. The allegations contained in this paragraph include legal conclusions, which do not require a response. To the extent a response is required, the allegations are denied.

FIRST AFFIRMATIVE DEFENSE

Plaintiffs claims are barred by the doctrine of laches.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs claims are barred by applicable statute of limitations.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs claims are barred, in whole or in part, because some or all of Plaintiffs' alleged damages are the result of Plaintiff's mental impairment which is the result of independent, preceding or superseding causes.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs claims are barred, in whole or in part, because of Plaintiff's purported emotional and mental anguish were not proximately caused by any act of the Defendant.

FIFTH AFFIRMATIVE DEFENSE

The Defendant Ronald A. Cohen respectfully submits and hereby gives notice that Plaintiff's Complaint contains false and frivolous allegations against the Defendant, violates Rule 11 of the Federal Rules of Civil Procedure and demands that the false and frivolous allegations be withdrawn within 21 days of service of this Answer.

DEMAND FOR JURY TRIAL

Defendant hereby demands a jury trial on all issues which can be heard by a jury.

PRAYER FOR RELIEF

WHEREFORE, the Defendant prays for judgment as follows:

1. That the Complaint be dismissed with prejudice;
2. That Plaintiff have and recover nothing from Defendant; and
3. That the costs of this action, including a reasonable attorney's fees, be taxed to the Plaintiff; and
4. Sanction Plaintiff pursuant to N.C. R. Civ. P. 11.

This the 14th day of August, 2019.

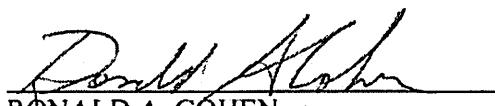

RONALD A. COHEN, *pro se*
2171 Britton Road
Apt. 208
Leland, NC 28451

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that the foregoing document was duly served upon all parties to this matter by depositing a copy thereof in the United States mail, first-class postage prepaid, and addressed as follows:

Steven L. Caponi, Esq.
Matthew B. Goeller, Esq.
K&L GATES LLP
600 N. King Street
Suite 901
Wilmington, DE 19801

This the 14th day of August, 2019.


RONALD A. COHEN, *pro se*
2171 Britton Road
Apt. 208
Leland, NC 28451

Page 1 of 1



ORIGIN ID: RZZA (919) 755-1800
LUCY GEOUGE
NEXSEN PRUET LLC
4141 PARKLAKE AVENUE
SUITE 200
RALEIGH, NC 27612
UNITED STATES US

SHIP DATE: 14AUG19
ACTWGT: 0.50 LB
CAD: 250192670NSX13400

BILL SENDER

TO OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
844 N KING ST UNIT 18

WILMINGTON DE 19801
(302) 573-6170
REF: 062266.00001 2708
INV: PO
DEPT:

567316977592



THU - 15 AUG 10:30A
PRIORITY OVERNIGHT

ASR
19801
DE-US PHL

TRK# 0201 7891 3607 4960
XB ZWIA



PS|Ship - FedEx Label

◀ Insert shipping
document here.

Do not ship liquids, blood, or clinical specimens in this packaging.